

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
A Limited Liability Partnership
2 Including Professional Corporations
JENNIFER G. REDMOND, Cal. Bar No. 144790
3 jredmond@sheppardmullin.com
PAUL S. COWIE, Cal. Bar No. 250131
4 pcowie@sheppardmullin.com
JOHN-PAUL S. DEOL, Cal. Bar No. 284893
5 jdeol@sheppardmullin.com
6 Four Embarcadero Center, 17th Floor
San Francisco, CA 94111-4109
7 Telephone: 415.434.9100
8 Facsimile: 415.434.3947

9 Attorneys for Plaintiff
10 META COMPANY

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 META COMPANY, a Delaware corporation,

15 Plaintiff,

16 v.

17 ZHANGYI ZHONG (a.k.a. Zhangyi “Johnny”
18 Zhong, a.k.a. Zhangyi “Kevin” Zhong), an
19 individual, DREAMWORLD USA INC., a
20 Delaware corporation, and DOES 1 through
21 20.

21 Defendants.

Case No. 3:17-cv-03259-EMC

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINES RE
MOTION FOR EXPEDITED
DISCOVERY, MOTION TO DISMISS,
AND CASE MANAGEMENT
CONFERENCE**

28 Case No. 3:17-cv-03259-EMC

SMRH:484160141.1

**STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINES RE MOTION
FOR EXPEDITED DISCOVERY, MOTION TO DISMISS, AND CASE
MANAGEMENT CONFERENCE**

1 Pursuant to Local Rule 6-2 of the Northern District of California, Defendants Zhangyi Zhong
2 and Dreamworld USA Inc. (“Defendants”) and Plaintiff Meta Company (“Meta” or “Plaintiff”)
3 hereby stipulate to move the hearing dates and extend the briefing deadlines on Plaintiff’s Motion
4 for Expedited Discovery (“Expedited Discovery Motion”) (Dkt. No. 21) and Defendant’s Motion to
5 Dismiss (“Motion to Dismiss”) (Dkt. No. 38).

6 WHEREAS, the Parties have tentatively resolved the above-captioned lawsuit (Deol Decl.,
7 ¶ 2);

8 WHEREAS, the Parties wish to avoid spending additional time and effort in briefing and
9 attending a hearing on the Expedited Discovery Motion and Motion to Dismiss, given that the case
10 has tentatively been resolved (Deol Decl., ¶ 3);

11 WHEREAS the Expedited Discovery Motion is set for hearing on October 26, 2017;

12 WHEREAS the Motion to Dismiss is set for hearing on October 26, 2017;

13 WHEREAS, Plaintiff’s opposition to the Motion to Dismiss is currently due on October 5,
14 2017;

15 WHEREAS, Defendants’ reply in support of the Motion to Dismiss is currently due on
16 October 12, 2017;

17 WHEREAS, there have been approximately four previous extensions of time (on various
18 matters) while the Parties have endeavored to settle this case (Deol Decl., ¶ 4);

19 WHEREAS, counsel for both Parties agree that the requested extension would not affect any
20 other deadlines in this case (Deol Decl., ¶ 5); and

21 WHEREAS, Civil Local Rule 6-2(a) of the Northern District of California states, “The
22 parties may file a stipulation ... requesting an order changing time that would affect the date of an
23 event or deadline already fixed by Court order, or that would accelerate or extend time frames set
24 in the Local Rules or in the Federal Rules.”

25 NOW, THEREFORE, in consideration of the foregoing, the Parties agree and hereby
26 stipulate that:

27 (1) the hearing on the Expedited Discovery Motion be continued to December 14, 2017;

- 1 (2) the hearing on the Motion to Dismiss be continued to December 14, 2017;
- 2 (3) Plaintiff may file its opposition to the Motion to Dismiss by no later than November
- 3 23, 2017;
- 4 (4) Defendants may file their reply to the Motion by no later than November 30, 2017;
- 5 (5) Plaintiff shall maintain its right to amend its Complaint without leave of Court until
- 6 November 23, 2017;
- 7 (6) the case management conference currently set for October 26, 2017 be continued to
- 8 December 14, 2017;
- 9 (7) the Parties be allowed to file their joint case management conference statement by
- 10 December 7, 2017; and
- 11 (8) the Parties be allowed to file the ADR Certification and Stipulation to ADR
- 12 Process/Notice of Need for ADR Phone Conference by November 23, 2017.

13 **IT IS SO STIPULATED.**

14 Dated: September 23, 2017

Respectfully submitted,

15

16 /s/ Rick C. Chang

17 Rick C. Chang (SBN 209515)

18 rchang@foley.com

19 Duane H. Mathiowetz (SBN 111831)

20 dmathiowetz@foley.com

21 FOLEY & LARDNER LLP

22 555 California Street, #1700

23 San Francisco, CA 94104

24 Counsel for Zhangyi Zhong and

25 Dreamworld USA Inc.

21 /s/ John-Paul S. Deol

22 Jennifer G. Redmond (SBN 144790)

23 jredmond@sheppardmullin.com

24 Paul S. Cowie (SBN 250131)

25 pcowie@sheppardmullin.com

26 John-Paul S. Deol (SBN 284893)

27 jdeol@sheppardmullin.com

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HAMPTON LLP

Four Embarcadero Center, 17th Floor

San Francisco, CA 94111-4109

27 Counsel for Meta Company

~~[PROPOSED]~~ ORDER

PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED.

Dated: 9/25/2017

